

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search Regarding No. 4:20-mj-78

20-098-04

**REDACTED AFFIDAVIT IN
SUPPORT OF SEARCH AND
SEIZURE WARRANT**

STATE OF SOUTH DAKOTA)
 :SS
COUNTY OF MINNEHAHA)

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the Sioux Falls Resident Agency, and I am charged with investigating violations of federal statutes within the District of South Dakota. I have worked as a Special Agent with the FBI for more than 12 years. I have conducted a wide variety of investigations to include international and domestic terrorism, violent crimes, white collar crimes, and crimes in Indian country. The information contained within this affidavit is based on my knowledge and on the knowledge and reporting of other law enforcement officers involved including those of the Charles Mix County Sheriff's Office and Yankton Sioux Law Enforcement.

2. Through this affidavit, I am requesting that a search and seizure warrant be issued for the search of Ronald David Bohn in order to obtain a sample of his DNA through the use of a buccal swab. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not

included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence of violations of Title 18 United States Code § 1111, murder, will be discovered through the comparison of Ronald's DNA to DNA obtained from samples of blood collected from the scene of the crime.

3. I have worked with other law enforcement personnel regarding this investigation. The statements contained in this affidavit are based on information that has been provided to me directly or indirectly by witnesses and other law enforcement personnel. The information and conclusions expressed are also based upon my own experience and training as a law enforcement officer, and my personal involvement and knowledge gained during the course of this investigation.

PROBABLE CAUSE

4. On the evening of September 15, 2020, I received a telephone call from Yankton Sioux Law Enforcement (YSLE) Acting Chief Edwin Young who advised that Isaac Wayne Primeaux, Jr., date of birth [REDACTED], 1966, an enrolled member of the Yankton Sioux Tribe, had been killed inside his apartment, Red Bird Elderly Complex, [REDACTED], Wagner, South Dakota, which is within Indian country, from an apparent stab wound to the chest. Ronald David Bohn, date of birth [REDACTED], 1970, an enrolled member of the Yankton Sioux Tribe, had been identified as the primary subject and had been apprehended in the city of Wagner by the Charles Mix County Sheriff's Office (CMCSO) before being turned

over to YSLE. Another Special Agent of the FBI and I responded to the scene and began an investigation into the incident.

5. Officers of YSLE provided that a trail of blood drops had been discovered on the sidewalk leading away from the door of the apartment. Officers had marked the drops of blood with paint to minimize damage and contamination. I inspected the drops of red substance and concluded that they were consistent with my knowledge of being drops of blood. I collected swabs of the drops of blood from multiple areas of the blood trail. I also collected swabs of blood from the floor and trashcan inside the apartment where Isaac Primeaux's body was located.

6. Officers of YSLE provided that Ronald Bohn had visited the residence of Janice Provost nearby and that Janice had stated that she interacted with Bohn inside her home that evening. I interviewed Janice who stated that she knew Bohn and that he was inside her residence briefly that evening. She stated that he was bleeding from his lip, that he spit blood into the trashcan, and that a drop of blood fell onto the kitchen floor. I collected a swab of the drop of blood from the kitchen floor.

7. Officers of YSLE and the CMCSO provided that Ronald Bohn was located and apprehended earlier that night inside a residence in Wagner on state land, just outside the exterior boundary of the tribe. The CMCSO deputy who had been looking for Bohn noticed blood on the sidewalk immediately in front of the residence and suspected Bohn might be inside. I collected a swab of the blood from the sidewalk in front of the residence.

8. On September 16, 2020, I interviewed Tiffany Flood who encountered Ronald Bohn outside the apartment immediately after Bohn allegedly stabbed Isaac Primeaux. Tiffany is in an intimate relationship with Kelly Cournoyer. Kelly's mother is Michelle Huapapi, who is married to Isaac and lives in the apartment with him. Tiffany called Isaac her uncle. Tiffany stated that on the evening of September 15, 2020, she was smoking a cigarette on the other side of the Red Bird Elderly Complex when she heard Isaac yelling, "My niece, my niece!" Tiffany knew it was Isaac from his voice and ran toward his apartment. She bumped into Kelly as she rounded the corner, and Kelly said, "he stabbed him," then Kelly continued to run away from the apartment. As she neared the front door, she encountered Bohn standing in front of the door with both of his hands behind his back. His lip was bleeding and he had blood on his shirt. Tiffany asked him what he had done, as she could hear Isaac inside making choking noises as he lay on the bed under the front windows. Bohn stated, "I think I fucked up, I think I fucked up, I think I killed him." Bohn then brought his hands out from behind his back, and Tiffany saw him holding a bloody kitchen knife. Tiffany demanded entry into the apartment, but Bohn blocked the door and told her that he did not think he could let her in. Tiffany told Bohn to get out of the way so she could check on Isaac; Bohn complied and fled on foot around the corner of the building and out of sight. Tiffany went inside the apartment and heard Michelle yelling, "Ron stabbed him, is Ike okay?" Tiffany tended to Isaac, who was gasping for air, and she asked him what happened; Isaac responded, "Ron did it," which were his last words.

9. I interviewed Michelle Huapapi who had been married to Isaac for about 15 years. Michelle stated that she was asleep when Isaac was stabbed but woke up shortly thereafter. She saw Isaac lying very still on his bed across the room and knew something was wrong. Michelle suspected that Ronald had stabbed Isaac because Ronald has a reputation for threatening people with knives. Ronald's reputation is such that whenever he visited Michelle's apartment, they knew to put away the knives in the kitchen. Michelle described incidents in which Ronald had threatened Isaac and Kelly with knives.

10. I obtained video recordings from the CMCSO depicting Ronald Bohn detained in the back of a patrol unit immediately after he was located. I reviewed the video and accompanying audio for any information Bohn might have disclosed. At 10:25:59 PM on September 15, 2020, Bohn whispered to himself, "I killed him. He's dead."

11. I obtained a YSLE police report describing an incident that occurred on May 29, 2020 at Isaac's apartment. Isaac told officers that Ronald had picked up a kitchen knife from inside the apartment and chased after him with it while threatening to kill him. Isaac's statement was corroborated by two witnesses. Ronald was arrested and subsequently charged with aggravated assault and resisting arrest. Ronald was arraigned at the same time he was arraigned for stabbing Isaac Primeaux; he pleaded not guilty, and the matter is currently pending trial.

12. I obtained tribal court documents regarding an incident that occurred on July 25, 2015 at the residence of Janice Provost. Ronald was

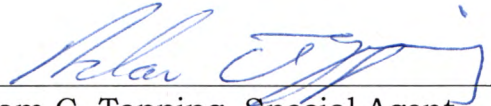
causing a disturbance which prompted Janice to call the police. Ronald was arrested and subsequently charged with disorderly conduct and carrying a concealed weapon, a kitchen knife which he had hid inside his clothing. Ronald pleaded guilty to the charges.

CONCLUSION


13. Based on my training and experience, I am aware that DNA evidence is contained in the hair, skin, blood, and saliva in the human body. These substances can be tested to obtain DNA. In order for the laboratory to conduct a comparative examination on the items of evidence collected in the investigation, a known sample of DNA from the alleged subject, Ronald Bohn, is required. I know a buccal swab is an expedient, prudent, and non-intrusive manner to obtain such a DNA sample.

14. Based on the foregoing, I believe there is probably cause to believe that Ronald David Bohn has committed a violation of Title 18 United States Code § 1111, murder, and evidence (DNA) can be located on his person which can be compared to the DNA obtained from the above noted evidence collected. All evidence will be submitted to the South Dakota Forensic Laboratory for DNA extraction and comparison.

15. I therefore respectfully request a search and seizure warrant be issued to search the person or body of Ronald David Bohn for the purposes of seizing saliva, cheek skin samples, and DNA via buccal swab.


Adam C. Topping, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me, telephonically, on this 29th day of
September, 2020, at Sioux Falls, South Dakota.


VERONICA L. DUFFY
United States Magistrate Judge

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

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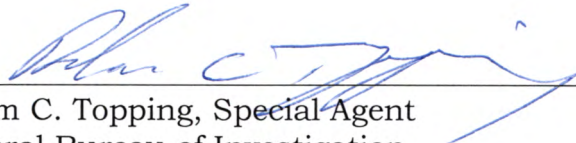
**REDACTED APPLICATION FOR
SEARCH AND SEIZURE WARRANT**

I, Adam C. Topping, being duly sworn depose and say:

I am a Special Agent with the Federal Bureau of Investigation (FBI), and have reason to believe that on the persons or bodies of Ronald David Bohn, currently located in the District of South Dakota, there is now concealed certain property, namely: head hair, skin, saliva, cheek skin samples, and DNA, which I believe is property constituting evidence of the commission of a criminal offense, contraband, the fruits of crime, or things otherwise criminally possessed, or property designed or intended for use or which is or has been used as the means of committing a criminal offense, concerning a violation of 18 U.S.C. § 1111.

The facts to support a finding of Probable Cause are contained in my Affidavit filed herewith, and attached hereto and incorporated by this reference.

Dated this 29th day of September, 2020.


Adam C. Topping, Special Agent
Federal Bureau of Investigation

Sworn to me telephonically on the 29th day of September, 2020.


VERONICA L. DUFFY
United States Magistrate Judge

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

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**REDACTED SEARCH AND
SEIZURE WARRANT**

TO: ANY AUTHORIZED LAW ENFORCEMENT OFFICER

An application by a federal law enforcement officer or an attorney for the government requests the search of the following property more fully described in the Affidavit, attached hereto and incorporated herein by reference: head hair, skin, saliva, cheek skin samples, and DNA.

I find that the affidavit, or any recorded testimony, establish probable cause to search and seize the property described above, and that such search will reveal evidence of violations of 18 U.S.C. § 1111, which is more fully described in the Affidavit.

YOU ARE COMMANDED to execute this warrant on or before

10-13-2020

(not to exceed 14 days)

☒ in the daytime - 6:00 a.m. to 10:00 p.m.

☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.


The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the undersigned Judge.

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized,

☐ for _____ days (not to exceed 30).

☐ until, the facts justifying, the later specific date of _____.

9-29-2020 at 3:15 pm CDT
Date and Time Issued at Sioux Falls, South Dakota


VERONICA L. DUFFY
United States Magistrate Judge

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

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REDACTED RETURN

Date and time warrant executed: _____

Copy of warrant and inventory left with: _____

Inventory made in the presence of: _____

Inventory of the property taken and name of any person(s) seized (attach additional sheets, if necessary):

<p style="text-align: center;">CERTIFICATION</p> <p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <p style="text-align: right;">_____ Adam C. Topping, Special Agent Federal Bureau of Investigation</p>
